Smith Creek (0202G) Recreational Use Attainability Analysis Summary and Recommendation

A recreational use attainability analysis (RUAA) was conducted on Smith Creek (0202G) in the summer of 2014 to determine the appropriate recreational use and numeric criteria. Smith Creek is an unclassified intermittent water body that is approximately 6 miles in length. The creek is located in Lamar County. It was identified in the 2014 Texas Clean Water Act Section 303(d) List of Impaired Water Bodies due to elevated bacteria levels. It was initially listed in 2006.

The RUAA identified that the presumed use of primary contact recreation (PCR) for Smith Creek should be revised to secondary contact recreation 1 (SCR 1). SCR applies to water bodies where water recreation can occur, but the nature of the recreation does not involve a significant risk of ingestion. SCR 1 applies to intermittent and perennial freshwaters where site-specific information demonstrates that primary contact recreation has little to no likelihood of occurring due to physical characteristics of the water body such as shallow depths or lack of pools.

During the field surveys, field staff did not observe any form of recreation occurring on the stream. Interviews with stakeholders and landowners indicated that most people have never personally used or witnessed PCR on the stream. One interview indicated that adult wading was observed on the stream in the summertime. Smith Creek had an average thalweg of 0.55 meters (21.65 in) and lacked pools deeper than 1 meter. Stream flow was normal during both surveys. At the time of the surveys, Smith Creek had a mid-range Palmer drought index. Public access is available at two of three survey sites via bridge crossings but overall instream access is very limited due to steep banks and dense vegetation. Instream obstacles included deep mud and logjams. There are no public parks on the creek.

Limited access and dense vegetation decrease the likelihood of PCR use. Smith Creek has vertical banks, instream obstructions, and no accounts of PCR, supporting reclassification to SCR1. In accordance with §307.4 (j)(3)(C) of the Texas Surface Water Quality Standards, the TCEQ recommends a reclassification from PCR to SCR1 with the corresponding geometric mean of 630 colonies *E. coli*/100mL for all of Smith Creek, from the confluence with Pine Creek upstream to the confluence of two unnamed streams south of Loop 286 in Paris. This reclassification is appropriate due to "physical conditions related to the natural features of the water body" in accordance with reasons specified in 40 CFR §131.10(g)(5).

Prior to changing the currently assigned recreational use of Smith Creek in the Texas Surface Water Quality Standards, the TCEQ would provide additional public notice and opportunity for public comment. In addition, the U.S. Environmental Protection Agency would review this proposed change under the provisions of the federal Clean Water Act.